

THE HONORABLE BARBARA J. ROTHSTEIN

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

SHANNON SPENCER, individually and  
on behalf of all others similarly situated,

Plaintiff,

v.

CONIFER REVENUE CYCLE  
SOLUTIONS, LLC, a Texas limited  
liability company doing business as  
CONIFER HEALTH SOLUTIONS LLC  
AND CONIFER HEALTH,

Defendants

NO. 2:23-cv-01790 BJR

**STIPULATED MOTION AND  
REQUEST TO STAY AND ORDER**

Plaintiff Shannon Spencer (“Plaintiff”) and Defendant Conifer Revenue Cycle Solutions, LLC (“Defendant”) (collectively, the “Parties”), by and through their respective undersigned counsel, respectfully submit this Stipulated Motion and Request to Stay.

After fully briefing Defendant’s Motion to Dismiss (Dkt. 7), the Parties conferred regarding alternative dispute resolution and agreed to mediation. Mediation is scheduled for May 23, 2024 with mediator Clifford Freed of Washington Arbitration and Mediation Services. As a result, the Parties request a stay of this action including further litigation, motions practice, related case deadlines, and any decision by the Court on Defendant’s pending Motion to Dismiss, until after mediation.

STIPULATED MOTION AND REQUEST TO STAY  
AND ORDER (2:23-cv-01790-BJR)

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1 The parties agree to submit a Joint Status Report by May 29, 2024, apprising the Court  
2 of the outcome of mediation and any resolution.

3 WHEREFORE, the Parties respectfully request that the Court grant this Stipulated  
4 Motion and Request to Stay.

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6  
7 Respectfully submitted this 18<sup>th</sup> day of March, 2024.

8 By: /s/ Timothy W. Emery

9 By: /s/ Patrick B. Reddy

10 By: /s/ Paul Cipriani

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*Attorneys for Defendant*

**ORDER**

Upon consideration of the Parties' Stipulated Motion and Request to Stay, the Court finds that good cause exists to stay this action until May 30, 2024 after mediation, and it is hereby **ORDERED** that this Motion is **GRANTED**.

It is **FURTHER ORDERED** that Parties shall file a Joint Status Report by May 29, 2024 apprising the court of any resolution.

DATED this 18th day of March, 2024



HONORABLE BARBARA J. ROTHSTEIN  
U.S. DISTRICT JUDGE